IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

) Hearing Date: Jan. 3, 2002 @ 9:30 a.m.
) Objections due by: Dec. 28, 2001 at 4:00 p.m.
)
Debtors.) Jointly-Administered
)
W. R. GRACE & CO., et al.,) Case No. 01-1139 (JJF)
)
IN RE:) Chapter 11

NOTICE OF MOTION

TO: Parties on the Attached Service List

The Official Committee of Asbestos Property Damage Claimants has filed the attached Motion for a Protective Order.

You are required to file a response to the attached motion on or before **Dec. 28, 2001 at 4:00 p.m.**

At the same time, you must also serve a copy of the response upon Movant's attorneys:

Michael B. Joseph, Esquire Scott L. Baena, Esquire

Theodore J. Tacconelli, Esquire Bilzin, Sumberg, Dunn, Baena, Price & Axelrod, LLP

Ferry & Joseph, P.A. 2500 First Union Financial Center 824 Market Street, Suite 904 200 South Biscayne Boulevard

Wilmington, Delaware 19801 Miami, Florida 33131-2336 (302) 575-1555 (305) 374-7580

HEARING ON THE MOTION WILL BE HELD ON January 3, 2002, at 9:30 a.m.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

FERRY & JOSEPH, P.A.

/s/Rick S. Miller

Theodore J. Tacconelli (No.2678) Rick S. Miller (No. 3418) 824 Market Street, Suite 904 P.O. Box 1351 Wilmington, DE 19899 (302) 575-1555

-and-

Scott L. Baena, Esquire Bilzin, Sumberg, Dunn, Baena, Price & Axelrod, LLP 2500 First Union Financial Center 200 South Biscayne Boulevard Miami, FL 33131-2336 (305) 374-7580

Attorneys for the Official Committee of Asbestos Property Damage Claimants

Date: November 14, 2001